

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

ANTHONY CHICCINI

*Defendant(s)*

Case No.

18- 29-M

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of see attached affidavit in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 2252(a)(2)

Receipt of child pornography

18 U.S.C. 2252(a)(4)(B)

Possession of child pornography

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.*Complainant's signature*

James Zajac, Special Agent, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 05/23/2018City and state: Philadelphia, Pennsylvania*Judge's signature*

JACOB P. HART, U.S.M.J.

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, James J. Zajac, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI for 12 years, and am currently assigned to the Philadelphia Division's Violent Crimes Against Children Squad. While employed by the FBI, I have investigated federal criminal violations related to identity theft, Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, training at the Innocent Images Unit of the FBI, various conferences involving Innocent Images and Crimes Against Children, and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. The statements in this Affidavit are based in part on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that ANTHONY CHICCINI, date of birth May 5, 1948, committed violations of Title 18 U.S.C. Section 2252 which makes it a crime to receive and possess child pornography or visual depictions involving the use of a minor engaging in sexually explicit, or any attempts to do so.

**LEGAL AUTHORITY**

4. Title 18 U.S.C. § 2252(a) prohibits a person from knowingly transporting, shipping, receiving, distributing, reproducing for distribution, possessing, or accessing with intent to view any visual depiction of minors engaging in sexually explicit conduct, or produced using a minor engaged in such conduct, when such visual depiction was either mailed or shipped or transported in interstate or foreign commerce, or in or affecting interstate commerce, by any means, including by computer, or when such visual depiction was produced using materials that had traveled in interstate or foreign commerce, and any attempts to do so.

**BACKGROUND OF THE INVESTIGATION**

5. On May 8, 2018 Adobe Systems Inc. submitted a total of nine CyberTipline Reports, assigned numbers 32032620, 32081243, 32082833, 32084325, 32086468, 32087356, 32087908, 32088553, and 32088866, to the National Center for Missing and Exploited Children (NCMEC) reporting the Adobe user account TONY@ANCCREATIVEIMAGE.COM contained numerous images depicting child pornography. This account was in the name of ANTHONY CHICINI with the billing address of 9270-B Jamison Avenue, Philadelphia, PA 19115. The Adobe product being used was reported as Revel Lightroom. The last four digits of the credit card that paid for this account were reported as 3890.

6. Along with the CyberTipline reports and account information, Adobe Systems Inc. also provided a total of 1,645 image files. All of these image files were uploaded to the account TONY@ANCCREATIVEIMAGE.COM on May 5, 2018 from IP address

98.114.232.173. The CyberTipline reports indicate that personnel from Adobe Systems Inc. viewed the entire contents of each of these files.

7. IP address 98.114.232.173 was assigned by the Internet Service Provider (ISP) Verizon in Philadelphia, PA. On May 10, 2018 an administrative subpoena was issued to Verizon requesting subscriber information for the account assigned IP address 98.114.232.173 on May 5, 2018 at 5:00 p.m. UTC. On May 14, 2018 Verizon provided results showing IP address 98.114.232.173 was assigned to the account DEENA MORRIS, 9270 Jamison Avenue, APT B, Philadelphia, PA 19115. IP address 98.114.232.173 was assigned to this account on February 9, 2018 and was currently still assigned to this account as of the date of the subpoena.

8. Your Affiant reviewed the 1,645 image files provided by Adobe Systems Inc. that were uploaded into the account TONY@ANCCREATIVEIMAGE.COM. Approximately 1,360 images depict child pornography of nude, prepubescent children, both males and females, engaging in sexual activity to include vaginal sex, oral sex, anal sex, or masturbation with other children and adults, or displaying their genitals in a lascivious manner. A majority of the rest of the images also depicted minors, however they are in various states of undress and their genitals are not visible. Three of the images uploaded into the TONY@ANCCREATIVEIMAGE.COM account are described below:

a. **file\_NYMPH-LOV2.17.jpg** – image file that has two photos combined into one image, depicting a nude, prepubescent female, with no pubic hair or breast development, laying on a bed and performing oral sex on a nude adult male in both photos.

b. **file\_NYMPH-LOV2.21.jpg** – image file that has three photos combined into one image, depicting a nude, prepubescent female, with no pubic hair or breast

development, engaging in vaginal sex with a nude adult male in two of the photos, and in the third photo the adult male is performing oral sex on the female.

c. **file\_CHL23\_20.jpg** – image file depicting two nude, prepubescent females, with no pubic hair or breast development, laying on a bed with their legs spread to expose their vaginas, and both of them are masturbating a nude adult male's penis.

9. Further investigation involving public records, PennDot records, U.S. Postal records, a criminal records check for ANTHONY CHICCINI, and agent surveillance confirmed that he is associated with the address at 9270 Jamison Avenue, Apartment B, Philadelphia, PA 19115.

10. On May 17, 2018 your Affiant applied for and was granted a federal search warrant by United States Magistrate Judge Timothy R. Rice, Eastern District of PA, to search for and seize evidence of violations of Title 18 U.S.C. Sections 2252 and 2252A, which makes it a crime to transport, possess, receive, distribute, or access with the intent to view child pornography or visual depictions of minors engaging in sexually explicit conduct, and any attempts to do so, from 9270 Jamison Avenue, APT B, Philadelphia, PA 19115, the residence of ANTHONY CHICCINI.

11. On May 23, 2018 this federal search warrant was executed on ANTHONY CHICCINI's residence. ANTHONY CHICCINI was home at the time of the search warrant, agreed to speak with your Affiant, and that statement was audio recorded. ANTHONY CHICCINI advised he has been viewing images and videos of child pornography for at least the past year. He uses the smart phone application Kik to chat with individuals who send him images of child pornography and also visits the website [imgsrc.ru](http://imgsrc.ru) to view and download images of child pornography. [Imgsrc.ru](http://imgsrc.ru) is a file hosting website where users post images to other users

to view. This website is known to your Affiant to contain images of child pornography that users post for others to view and download.

12. ANTHONY CHICCINI stated he last viewed child pornography last night, May 22, 2018, using an Android smart phone. An Android LG smart phone with IMEI number 35822608036073 was seized during the execution of the search warrant. ANTHONY CHICCINI was shown this LG smart phone, stated it was his, and provided the swipe code to unlock the smart phone.

13. Your Affiant viewed the Gallery application on CHICCINI's LG phone, where images and videos are saved. In the Gallery there is an album named ScreenMaster. ANTHONY CHICCINI advised ScreenMaster is an application he installed to allow him to manually take screenshots of what is being viewed on the smart phone screen. Located in this folder were 45 images. Of these images, approximately 38 of them depict child pornography of nude, prepubescent girls, with no pubic hair or breast development, spreading their legs to display their genitals, masturbating, or engaging in oral sex with other children. These images appear to be screenshots of images being hosted on the imgsrc.ru website.

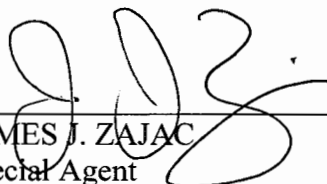
14. At least three of these child pornography images have created dates of May 22, 2018 which is the date the images were being viewed and the screenshots taken when ANTHONY CHICCINI received these images to his smart phone. These three child pornography images are named: Screenshot\_2018-05-22-22-34-49.jpg, Screenshot\_2018-05-22-22-34-33.jpg, and Screenshot\_2018-05-22-22-34-24.jpg, and they all depict a nude, prepubescent girl, with no pubic hair or breast development, spreading her legs to display her vagina. All three of these images were received from the imgsrc.ru website.



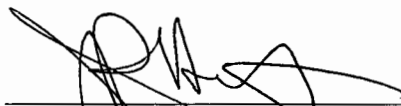
**CONCLUSION**

15. Based upon the information above I respectfully submit that there is probable cause to believe that ANTHONY CHICCINI did receive and possess child pornography or visual depictions of minors engaging in sexually explicit conduct, in violation of Title 18 U.S.C. Section 2252, as more fully set forth in Attachment A.

16. Therefore, I respectfully request that the attached arrest warrant be issued authorizing the arrest of ANTHONY CHICCINI, date of birth May 5, 1948.

  
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JAMES J. ZAJAC  
Special Agent  
Federal Bureau of Investigation

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 23 DAY  
OF MAY, 2018.

  
\_\_\_\_\_  
HONORABLE JACOB P. HART  
United States Magistrate Judge